

E-01575A-15-0312

OPEN MEETING AGENDA ITEM



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**ORIGINAL Arizona Corporation Commission
Utilities Complaint Form****Investigator:** Trish Meeter**Phone:** <<< REDACTED >>>**Opinion Date:** 10/27/2016**Opinion Number:** 2016 - 135316**Priority:** Respond within 5 business days**Opinion Codes:** Rate Case Items - Opposed**Closed Date:** 10/27/2016 10:36 AM**First Name:** Graham**Last Name:** Eberly**Account Name:** Graham Eberly**Address:** <<< REDACTED >>>**City:** Hereford**State:** AZ**Zip Code:** 85615**Cell:** <<< REDACTED >>>**Email:** <<< REDACTED >>>**Company:** Sulphur Springs Valley Electric Cooperative, Inc.**Division:** Electric**Nature Of Opinion****Docket Number:** E-01575A-15-0312**Docket Position:** Against

Commissioners: I am a DG-solar system owner in the Sulphur Springs Valley Electric Cooperative (SSVEC) service area and am writing regarding the rate case before you. I STRONGLY ENCOURAGE you to accept these recommendations from Judge Belinda Martin: - REJECTING SSVEC's attempt to set a retroactive grandfathering date of April 15, 2015, and setting as default Commission policy that any grandfathering policies will be effective only on the date of the Commission's final decision. - Directing that DG-solar customers NOT be segregated into a separate rate class but be treated the same as other residential customers. - Rejecting SSVEC's claim that DG-solar customers are the sole cause of the \$1.13M "under-collection" the co-op reported in 2014. (I would remind you that during that "test year," SSVEC still made \$7M above their expenses.) - Directing that determining the rates for DG-solar customers be delayed into a second phase of this case that will begin only after the Value of Solar rate case is completed. - Directing that any new Net Metering tariff for DG customers, and for that matter any other rate changes, be phased in over time. I generally support the concept of adjusting service availability and energy charges to better reflect the costs these charges are meant to pay for, but I would remind the Commission that even the residential rate structure Judge Martin recommends approving will reward those who use more energy than average by actually lowering what they pay in their combined service availability and energy fees while INCREASING that amount for those who use less energy. If SSVEC is genuinely interested in encouraging customer and energy savings, this should be reversed. I would also encourage you to support the following ACC staff recommendations: - Moving to fewer inter-class subsidies. - New Service Charges roll-out and handling recommendations: informing customers of service costs in advance, placing all service charges on SSVEC's website, not charging customers for issues on the co-op side of meter or for normal maintenance. These practices should be models for these and other types of changes. DG-solar customers are not SSVEC's enemy. We deserve to be treated with respect and charged rates that are reasonable and appropriate. Judge Martin's and the staff's recommendations above move this case in that direction for all SSVEC residential customers and I again encourage you to support them. Sincerely, Graham Eberly

Investigation**Date:****Analyst:****Submitted By:****Type:**

10/27/2016

Trish Meeter

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